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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

CR 11-202-MO

Plaintiff,

vs.

HUY ANH NGUYEN,

Defendant.

**UNOPPOSED MOTION TO
CONTINUE TRIAL DATE**

Defendant, Huy Anh Nguyen, through his attorney, C. Renée Manes, moves this Court to continue the trial in the above-entitled case, which is presently scheduled for August 30, 2011, for a period of eight weeks or until October 25, 2011, or a date thereafter convenient to the Court. This is the first continuance sought by any defendant. Undersigned counsel for Mr. Huy Nguyen has consulted with counsel for all other defendants (Ken Perry, counsel for

Mr. Tu Tran; Mark Bailey, counsel for Ms. Minhthy Nguyen; and Ben Anderson, counsel for Mr. Kiet Nguyen), who agree to this request. Assistant United States Attorney Jennifer Martin does not object to this motion.

This continuance constitutes excludable delay to October 25, 2011, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The ends of justice served by granting this motion outweigh the best interests of the public and Mr. Nguyen in a speedy trial as additional time is required because of the complexity of this case, including the fact that AUSA Martin has informed undersigned counsel that additional charges are possible in this matter, and that the Government has provided almost six thousand pages of discovery, including fifteen hundred pages that were provided in the last week. Counsel needs additional time to complete review of the discovery, allow for Mr. Nguyen to review that discovery as well,¹ research the issues, and advise Mr. Nguyen on his options.

Mr. Nguyen understands his speedy trial rights and agrees to reset his trial date. He understands that this period would constitute excludable delay under the Speedy Trial Act.

RESPECTFULLY SUBMITTED this August 16, 2011.

/s/ C. Renée Manes

C. Renée Manes
Attorney for Defendant

¹ Much of that review needs to occur at counsel's office, given the Protective Order imposed in this matter.